

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:	Chapter 11
ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, a New Mexico corporation sole,	Case No. 13-13676-t11
Debtor.	Jointly Administered with:
	Case No. 13-13677-t11
Jointly Administered with:	[Docket No. 402]
BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, an Arizona corporation sole.	
This pleading applies to:	
<input checked="" type="checkbox"/> All Debtors.	
<input type="checkbox"/> Specified Debtor.	

**MOTION FOR ENTRY OF ORDER TO FILE UNDER SEAL
EXHIBITS A THROUGH F TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITOR’S MEMORANDUM IN SUPPORT OF STAY RELIEF MOTIONS**

The Official Committee of Unsecured Creditors, by and through its undersigned counsel, respectfully requests this Court enter an Order to File Under Seal Exhibits A through F to the *Official Committee of Unsecured Creditors’ Memorandum in Support of Stay Relief Motions* [Dkt. No. 402] (“Seal Motion”).

Good cause exists for the filing of this Seal Motion because:

1. Pursuant to the *Order Fixing Time for Filing Proofs of Claim, Approving Claim Forms, and Approving Manner and Form of Notice* entered on April 11, 2014 [Dkt. No. 218], abuse claim forms are filed under seal in hard copy and kept under seal in order to ensure that the identity of the Tort Claimants remain confidential.

2. Exhibits A through F to the *Official Committee of Unsecured Creditors'* *Memorandum in Support of Stay Relief Motions* (the "Memorandum") are comprised of Proofs of Claims and state court complaints which contain the names and personal information of three tort claimants.

For all of the foregoing reasons, the Committee respectfully requests that the Court enter an order, substantially in the form of the proposed order filed herewith,

1. Authorizing Pachulski Stang Ziehl & Jones LLP to file Exhibits A through F to the Memorandum under seal: and

2. Granting further relief as is just and proper.

Dated: July 9, 2015

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ James I. Stang

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CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b)(3), F.R.B.P. 9036 and NM LBR 9036-1(b), I hereby certify that on July 9, 2015, I caused service of the foregoing **MOTION FOR ENTRY OF ORDER TO FILE UNDER SEAL EXHIBITS A THROUGH F TO PACHULSKI STANG ZIEHL & JONES LLP'S MEMORANDUM IN SUPPORT OF STAY RELIEF MOTIONS** as follows:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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